

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE

REC'D TN  
REGULATORY AUTH.

JUL 25 PM 1 49

IN RE: ALL TELEPHONE )  
COMPANIES FILINGS REGARDING )  
RECLASSIFICATION OF PAY )  
TELEPHONE SERVICE AS )  
REQUIRED BY FCC DOCKET 96-128. )

OFFICE OF THE  
EXECUTIVE SECRETARY

Docket 97-00409

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CONSUMER ADVOCATE'S DISCOVERY REQUEST TO CITIZENS  
TELECOMMUNICATIONS OF TENNESSEE AND CITIZENS TELECOMMUNICATIONS  
OF THE VOLUNTEER STATE, JULY 25, 2000

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Please reply to the discovery requests provided herein by: 1) answering under oath these discovery requests and serve your answers upon Consumer Advocate L. Vincent Williams or his designee at 2nd Floor Cordell Hull Bldg. 425 5th Avenue North, Nashville Tennessee, 37243; and 2) provide clear copies of the documents and things specified herein or arrange for inspection and copying of said documents and things at a mutually agreed time.

Please be aware that this discovery is continuing in nature and requires you to provide supplemental responses if additional or different information is obtained or as may be necessary from time to time to provide the Petitioner with a full, complete and current answer or response.

INSTRUCTIONS AND DEFINITIONS

The terms "you", "your" and "yours" as used herein refer to the addressee of these Interrogatories as well as any and all agents, employees, representatives, and other persons acting or purporting to act on your behalf.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those

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sources.

If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy), each version shall be treated as a different document and each must be identified and produced.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. To assist you in providing full and complete discovery, Petitioner provides the following definitional guidelines.

1. The term "person" or "persons" as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served all responses must include the company's response. Moreover, the company's designated person for responding must assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.*

2. The term "document" as used herein has the full extent of its possible meaning in accordance with law, including any written, printed, typed, drawn, filmed, taped, or recorded in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, photograph, tape recording, computer disk or record, or other data compilation in any form. This definition shall also mean all copies of documents by whatever means made including any nonidentical versions or drafts (whether different from the original because of handwritten notes, underlining, highlighting, or otherwise).

3. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

4. References to the masculine shall include the feminine, the singular shall include the plural, and vice versa.

5. The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

6. Each discovery answer should begin by restating the item requested.

7. Where a number of sheets are required to fully answer an item, each sheet should be

appropriately indexed, for example, Item 1(a), Sheet 1 of 6.

8. If any information requested is not furnished as requested, please state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

9. Please respond fully to the request even if it has been partially requested or supplied in prior filings or dockets. The information and Rule 33 and 34 information shall be submitted to this office at 2nd Floor Cordell Hull Bldg. 425 5th Avenue North, Nashville Tennessee, 37243. If there is a need for clarification of any attached request, please contact me at (615) 741-8700 before furnishing the response.

### INTERROGATORIES

1. Please provide a study identifying the cost of providing payphone lines reflecting the decisions made by the Tennessee Regulatory Authority in the Phase I order (5/20/98) and the Phase II order (9/16/99) in Docket 97-00888 (Universal Service Proceeding), and the Phase I order (1/25/99) in Docket 97-01262 (Petition to Convene a Contested Case Proceeding, to Establish Permanent Prices for Interconnections and Unbundled Network Elements. Provide detailed workpapers showing source of data and the development of all computed factors and amounts included in the study.
2. If it is Citizens Telecommunications of Tennessee's and Citizens Telecommunications of the Volunteer State's position that the methodology used for determining the costs of unbundled network elements is inappropriate for use in determining the cost of payphone access lines, provide a detailed explanation of the methodology that Citizens believes is superior for determining the cost of each of each of the elements that make up the payphone access line and explain why Citizens' preferred methodology is superior.
3. If it is Citizens Telecommunications of Tennessee's and Citizens Telecommunications of the Volunteer State's position that the methodology used for determining the costs of unbundled network elements is inappropriate for use in determining the cost of payphone access lines, provide a detailed study identifying the cost of each network element that make up payphone lines, identify the source of all data used, and supply supporting workpapers that show the development of all factors and amounts.
4. For each month, January 1997 to present, identify by wire center:

- a. The number of payphone lines provided to non-affiliated payphone providers;
  - b. The number of payphone lines provided to company owned payphones or payphones owned by an affiliate;
  - c. The revenues collected from payphone lines provided to non-affiliates; and
  - d. The revenue collected from payphone lines provided to affiliates.
5. Identify the average loop length of:
- a. All access lines,
  - b. business access lines,
  - c. residential access lines, and
  - d. payphone access lines.

Respectfully submitted,



L. Vincent Williams

# CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on the parties listed below by mail on this the 25<sup>th</sup> day of July, 2000.

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L. Vincent Williams